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November 9, 2016

VIA ELECTRONIC FILING

Honorable Madeline Cox Arleo, U.S.D.J.
United States District Court
District of New Jersey
M.L. King, Jr. Federal Building & Courthouse
50 Walnut Street, Room MLK 2A
Newark, New Jersey 07102

Re: *Giercyk, et al v. National Union Fire Insurance Company of Pittsburgh, PA, et al*
Case No.: 2:213-cv-06272 (MCA) (MAH)

Dear Judge Arleo:

Defendants hereby request, on an expedited basis, that the Court modify certain deadlines set out in the Court's October 13, 2016 Order Granting Preliminary Approval of Class Action Settlement (the "Preliminary Approval Order"). Plaintiffs consent to this request. These modifications set out below provide an orderly briefing schedule on any objections to the settlement and to provide the Court with sufficient time to consider briefing prior to the final approval hearing scheduled for April 20, 2017.

The Preliminary Approval Order sets a March 31, 2017 deadline for class members to object to or opt out of the settlement, which is only 20 days before the final approval hearing scheduled for April 20, 2017. The current schedule also requires Plaintiffs to file their Motion for Final Approval by April 17, 2017, which is just three days before the final approval hearing. The current schedule provides a tight window of time, for the parties to address objections or final approval matters. Accordingly, the modifications requested are as follows:

First, the deadline for class members to file objections and requests for exclusion should be advanced by three weeks to March 10, 2017.

Second, the parties shall file briefs responding to objections, should there be any, by March 27, 2017, with any supplemental briefing from objectors to be filed no later than April 7, 2017.

Third, Plaintiffs' Motion for Final Approval shall be filed on or before March 27, 2017, instead of April 17, 2017.

Under the proposed schedule, any potential class member would still have over 90 days to object to or opt out of the settlement, no party would be prejudiced, and the proposed schedule would improve judicial efficiency and the Court's opportunity to consider the arguments of the parties. This proposal does not change the scheduled Final Approval Hearing date of April 20, 2017.

The parties respectfully request an expedited ruling on this Joint Motion, if possible, on November 10, 2016, because of the deadlines for the notices to be sent by the Settlement Administrator pursuant to the Preliminary Approval Order. We appreciate the Court's consideration of this Motion.

Respectfully submitted,

Grant W. McGuire

Cc: All Counsel of Record
Via Electronic Filing

SO ORDERED


Madeline Cox Arleo, U.S.D.J.